

## ANTI-BRIBERY POLICY

SILO POWER LTD has built its business on a reputation for fair and honest dealing and acting in an ethical manner. Since the company has directed its focus toward growth throughout Tanzania, it wishes to reaffirm that it will continue to adhere to this standard for itself and its employees, wherever located. Accordingly, it is the policy of the company that neither the company nor its officers or employees shall pay, offer to pay or promise to give anything of value directly or indirectly to any other official for the purpose of influencing an official act or decision related to retaining or obtaining business or directing business to any person.

SILO POWER LTD may encounter particular pressure to make such payments where extraordinary competition exists for business opportunities and should be particularly vigilant not to be tempted by assertions that such practices are common or condoned in that place. Consequently, if at any time you should have a question with respect to a contemplated gift or payment, direct your inquiry to the office of the Managing Director of SILO POWER LTD

### THE POLICY

#### 1. Purpose

SILO POWER LTD is committed to protecting its reputation, revenues, assets and information from any attempts of fraud, deceit or other improper conduct by employees or third parties. Accordingly, the Board of Directors of SILO POWER LTD has adopted a Code of Business Conduct and Ethics which embodies the company's commitment to conduct its business in accordance with all applicable laws, rules and regulations and the highest ethical standards.

This Anti-Bribery Policy is intended to supplement all applicable laws, rules and regulations and other policies, including the Code of Business Conduct and Ethics. This policy sets out SILO's expectations and requirements relating to the prohibition, recognition, reporting and investigation of suspected fraud, corruption, misappropriation and other similar irregularities. This policy applies to every SILO POWER LTD employee, including senior executives, financial officers, and members of our Board of Directors.

#### 2. Definition

The term "Bribe", as used in this policy, generally refers to any intentional act committed to secure an unfair or unlawful gain, including, but not LTD to, fraud, corruption, misappropriation, theft and other similar irregularities that reflect actual or potential:

- Misrepresentation in SILO POWER LTD publicly released financial statements or other public disclosures;
- Misappropriation or theft of SILO POWER LTD assets such as money, equipment or supplies;
- Unlawfully obtained revenue and assets, or unlawful avoidance of taxes, costs and expenses;
- Commercial bribery or bribery of a government official or other violation of anti-corruption laws; or

- Improper payment schemes include employees or directors of SILO POWER LTD seeking or accepting from, paying or offering to suppliers or business partners kickbacks or gifts intended to or which may appear to influence business judgment.

### **3. Reporting of Fraud**

SILO POWER LTD expects all employees to take all reasonable steps to prevent fraud and to identify and report known or suspected fraud ("Fraud Concerns") committed by or against SILO POWER, whether by SILO POWER LTD employees or outside parties. All Fraud Concerns must be reported. SILO POWER LTD Code of Business Conduct and Ethics/Anti-Fraud Escalation Policy provides a framework to ensure that suspected violations of this policy are reported to appropriate levels of management and to the Audit Committee of the Board of Directors of SILO POWER. Elements of this framework are summarized in this policy. As a general guideline, Fraud Concerns should be promptly reported by an employee to local management in the first instance unless an employee believes it is inappropriate to do so under the circumstances. Reporting concerns to local management in this manner is often the most effective way to promote an open and positive work environment.

*If reporting a Fraud Concern to local management is not possible or advisable for some reason, or if raising a Fraud Concern with local management does not resolve the matter, an employee should promptly contact the Managing Director.*

### **4. Confidentiality and Non-Retaliation**

Every reasonable effort will be made to ensure the confidentiality of the reported Fraud Concern and the identity of those providing information to the extent consistent with the need to conduct an appropriate, fair and thorough investigation. Fraud Concerns may be reported anonymously. If you prefer to report a Fraud Concern anonymously, you must provide enough information about the incident or situation to properly allow SILO POWER LTD to investigate. SILO POWER LTD will not tolerate retaliatory action against any individual for reporting, in good faith, concerns regarding known or suspected fraud.

### **5. Disciplinary Action**

SILO POWER LTD expects all employees and directors to act in full compliance with this policy, the Code of Business Conduct and Ethics and other policies of SILO POWER and in a manner consistent with the highest ethical standards. An employee or director found to have been involved in fraudulent activity or other misconduct or failed to report a known or suspected instance of fraud will be subject to disciplinary action up to and including termination. Furthermore, such conduct may also be a violation of the law and may result in civil or criminal penalties for the employee, director and/or



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**Managing Director**  
**SILO POWER LIMITED**